# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT DISTRICT OF VERHONT FILED

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UNITED STATES OF AMERICA	)	PATTY COUNTY
v.	).	Criminal No. 5:19-cr-30
CHYQUAN CUPE, aka "Cash,"	)	
DESIREE WELLS-COOPER,	)	
LINDA WAINWRIGHT,	)	
JUAN A. SANCHEZ, JR., and	)	
PEDRO OCASIO, aka "Pluto", aka "Boobie,"	)	
Defendants.	)	

#### SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

#### Count One

Between in or about October 2018 and on or about February 28, 2019, in the District of Vermont and elsewhere, the defendants, CHYQUAN CUPE, aka "Cash," DESIREE WELLS-COOPER, LINDA WAINWRIGHT, JUAN A. SANCHEZ, JR., PEDRO OCASIO, aka "Pluto," aka "Boobie," and others, known and unknown to the grand jury, knowingly and willfully conspired to distribute controlled substances, to wit: heroin, a Schedule I controlled substance; cocaine base, a Schedule II controlled substance; and fentanyl, a Schedule II controlled substance.

With respect to defendants CHYQUAN CUPE, aka "Cash," DESIREE WELLS-COOPER, LINDA WAINWRIGHT, and PEDRO OCASIO, aka "Pluto," aka "Boobie," their conduct as members of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams or more of a mixture or substance containing a

detectable amount of cocaine base, and 100 grams or more of a mixture or substance containing a detectable amount of heroin.

(21 U.S.C. §§ 841(a), 841(b)(1)(B), 841(b)(1)(C), and 846)

## Count Two

On or about October 30, 2018, in the District of Vermont, the defendant, CHYQUAN CUPE, aka "Cash," knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

## Count Three

On or about October 30, 2018, in the District of Vermont, the defendant, CHYQUAN CUPE, aka "Cash," knowingly and intentionally distributed cocaine base, a Schedule II controlled substance.

## Count Four

On or about November 1, 2018, in the District of Vermont, the defendant, CHYQUAN CUPE, aka "Cash," knowingly and intentionally distributed cocaine base, a Schedule II controlled substance.

## Count Five

On or about December 28, 2018, in the District of Vermont, the defendant, CHYQUAN CUPE, aka "Cash," knowingly and intentionally possessed with the intent to distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(B); 18 U.S.C. § 2)

## Count Six

On or about February 15, 2019, in the District of Vermont, the defendant, DESIREE WELLS-COOPER, knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

# Count Seven

On or about February 20, 2019, in the District of Vermont, the defendant, LINDA WAINWRIGHT, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

## Count Eight

On or about February 22, 2019, in the District of Vermont, the defendant, LINDA WAINWRIGHT, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

# Count Nine

On or about February 25, 2019, in the District of Vermont, the defendant, DESIREE WELLS-COOPER, knowingly and intentionally distributed fentanyl, a Schedule II controlled substance.

#### Count Ten

On or about February 28, 2019, in the District of Vermont, the defendant, JUAN A. SANCHEZ, JR., knowingly and intentionally possessed with the intent to distribute cocaine, a Schedule II controlled substance, and cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

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CHRISTINA E. NOLAN (JAO) United States Attorney Rutland, Vermont August 14, 2019